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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CHRISTOPHER RYAN MARTIN,  
Petitioner,  
v.  
TOM LAWSON, *et al.*,  
Respondents.

Case No. 2:22-cv-00850-APG-VCF

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
RESPONSE TO PETITION FOR WRIT OF  
HABEAS CORPUS  
(ECF NO. 1)**

**(FIRST REQUEST)**

Respondents move this Court for an enlargement of time of 45 days from the current due date of September 6, 2022, up to and including October 21, 2022, in which to file their Response to Martin's Petition for Writ of Habeas Corpus (ECF No. 1). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

This is the first enlargement of time sought by Respondents and is brought in good faith and not for the purpose of delay.

DATED September 6, 2022

Submitted by:

AARON D. FORD  
Attorney General

By: *s/ Katrina A. Lopez*  
Katrina A. Lopez (Bar No. 13394)  
Deputy Attorney General

**DECLARATION OF KATRINA A. LOPEZ**

I, Katrina A. Lopez, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am  
2 employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been  
3 assigned to represent Respondents in *Christopher Ryan Martin v. Tom Lawson, et al.*, Case No. 2:22-  
4 cv-00850-APG-VCF, and as such, have personal knowledge of the matters contained herein.

5. This Motion is made in good faith and not for the purpose of delay.

6. The Response to Martin's Petition is currently due on Tuesday, September 6, 2022.

7. Respondents have been unable with due diligence to timely complete the Response.

8. In the past few months, Respondents filed a reply in support of motion to dismiss filed  
9 June 20, 2022 (*Christopher Lenard Blockson v. Jerry Howell, et al.*, Case No. 2:21-cv-00731-GMN-  
10 VCF); supplemental briefing in the Ninth Circuit filed June 29, 2022 (*Darrell Conners v. William*  
11 *Hutchings, Warden; Attorney General for the State of Nevada*, Case No. 21-15693); a motion to dismiss  
12 filed July 7, 2022 (*Kwame Anir Saafir v. City of Las Vegas, et al.*, Case No. 2:21-cv-01832-JAD-VCF);  
13 an answering brief in the Ninth Circuit filed July 25, 2022 (*John Vernon Fields v. Renee Baker, Warden*  
14 *and Attorney General for the State of Nevada*, Case No. 20-17342); an answer filed July 28, 2022 (*Carlos*  
15 *Gonzalez-Rojas v. Calvin Johnson*, Case No. 2:21-cv-01652-APG-DJA); a reply in support of motion to  
16 dismiss filed August 15, 2022 (*Allen S. Heusner v. Dwight Neven, et al.*, Case No. 2:14-cv-01119-RFB-  
17 GWF); a reply in support of motion to dismiss filed August 16, 2022 (*Cory O'Neal Brewer v. William*  
18 *Gittere, et al.*, Case No. 3:20-cv-00396-MMD-CLB); a reply in support of motion to dismiss filed August  
19 17, 2022 (*Kwame Anir Saafir v. City of Las Vegas, et al.*, Case No. 2:21-cv-01832-JAD-VCF); a response  
20 to motion for reconsideration filed August 22, 2022 (*Ricardo Quintanilla v. Brian Williams, et al.*, Case  
21 No. 2:20-cv-00211-GMN-NJK); a motion to dismiss filed September 1, 2022 (*Corry Alexis Hawkins v.*  
22 *Calvin Johnson, et al.*, Case No. 2:20-cv-01852-CDS-VCF); and various responses in state post-  
23 conviction cases.

24. Respondents communicated with counsel for Martin regarding this extension and they do  
25 not object to this request.

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7. Based on the foregoing, Respondents respectfully request an enlargement of time of 45 days from the current due date, September 6, 2022, up to and including October 21, 2022, to file our Response.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 6, 2022.

/s/ Katrina A. Lopez  
Katrina A. Lopez (Bar. No. 13394)  
Deputy Attorney General

## IT IS SO ORDERED:

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**UNITED STATES DISTRICT COURT**

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Dated: September 7, 2022